

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

In re:)	Chapter 11
LINC USA GP, <i>et al.</i> ¹)	Case No. 16-32689 (DRJ)
Debtors.)	(Joint Administration Requested)

**WITNESS AND EXHIBIT LIST FOR
MAY 31, 2016 HEARING ON FIRST DAY MOTIONS**

Linc USA GP, *et al.*, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby file their witness and exhibit list for the hearing on the First Day Motions on May 31, 2016 at 3:30 p.m. (CT) (“Witness and Exhibit List”) as follows:

WITNESSES

- Jude Rolfes
- Sunny Cheung
- Any witness called by another party

The Debtors reserve the right to call rebuttal witnesses as necessary. The Debtors reserve the right to call any witness identified or called by another party or by the Court. The Debtors reserve the right to not call any witness identified herein. The Debtors reserve the right to supplement this witness list.

¹ The Debtors in these chapter cases, along with the last four digits of each Debtor’s federal tax identification number, are: Linc Energy Finance (USA), Inc. (6684); Linc USA GP (5234); Linc Energy Resources, Inc. (9613); Linc Gulf Coast Petroleum, Inc. (6790); Linc Energy Petroleum (Louisiana), LLC (1074); Linc Alaska Resources, LLC (2362); Paen Insula Holdings, LLC (1681); Linc Energy Petroleum (Wyoming), Inc. (9859); Diasu Holdings, LLC (9626); Diasu Oil & Gas Company, Inc. (8926); and Linc Energy Operations, Inc. (5806).

EXHIBITS

Ex. No.	Description	Offered	Objection	Admitted/ Not Admitted
1	Notice of Hearing on First Day Motions [Dkt. No. 13]			
2	Declaration of Jude Rolfes, Vice President – Corporate Development, in Support of Chapter 11 Petitions and First Day Pleadings [Dkt. No. 14]			
3	Debtors' Utility Service Providers List [Dkt. No. 5-1]			
4	List of Taxing Authorities [Dkt. No. 6-1]			
5	Debtors' Bank Accounts [Dkt. No. 9-1]			
6	Declaration of Evan Gershbein in Support of Debtors' Application for Appointment Kurtzman Carson Consultants LLC as Claims and Noticing Agent [Dkt. No. 10-1]			
7	KCC Services Agreement [Dkt. No. 10-2]			
8	Declaration of Sunny Cheung in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. § 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) [Dkt. No. 11-3]			
9	Debtor In Possession Budget [Dkt. No. 11-2]			

Ex. No.	Description	Offered	Objection	Admitted/ Not Admitted
10	Proposed Interim Order (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. § 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) [Dkt. No. 11-4]			
11	Superpriority Debtor in Possession Credit and Guaranty Agreement [Dkt. No. 11-1]			
12	Certificate of Service of First Day Motions [Dkt. No. 16]			

The Debtors reserve the right to utilize additional rebuttal exhibits as necessary. The Debtors reserve the right to supplement this Exhibit List. The Debtors reserve the right to use as its own exhibit any exhibit identified or offered by any other party.

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Respectfully Submitted,

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**PROPOSED COUNSEL FOR THE DEBTORS
AND DEBTORS IN POSSESSION**